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6 Attorney for Trustee  
Eric J. Nims

8 IN THE UNITED STATES BANKRUPTCY COURT  
9 FOR THE EASTERN DISTRICT OF CALIFORNIA  
10 (Sacramento Division)

11 In re:	)	Case No. 10-53821
12 Kevin Lee Moser and	)	DC No. CWC-2
13 Amanda Mary Moser,	)	Chapter 7 Case
14 4480 Cove Court	)	
15 Tracy, CA 95377	)	
16 S.S. xxx-xx-1900	)	
17 xxx-xx-4519	)	
18 Debtors.	)	Date: July 11, 2011
	)	Time: 10:00 a.m.
	)	Place: Courtroom 28

20 **MOTION FOR AUTHORITY TO SELL NON-EXEMPT**  
21 **EQUITY IN PERSONAL PROPERTY TO DEBTORS**

22 To: The Honorable Michael S. McManus, U.S. Bankruptcy Judge:  
23 The Chapter 7 Trustee, Eric J. Nims, pursuant to 11 U.S.C. §  
24 363(b) and Federal Rule of Bankruptcy Procedure 6004,  
25 respectfully moves the Court to sell to the Debtors' the non-  
26 exempt equity in certain personal property in exchange for a  
27 payment of \$5,000.00, and respectfully represents:  
28



1 sum of \$5,000.00 (the "Purchase Amount") for the non-exempt  
2 equity in the Property. A copy of the Equity Sale Agreement is  
3 attached to the List of Exhibits filed concurrently herewith.  
4 The Agreement further provides that the Purchase Amount shall be  
5 non-exempt property of the Debtors' bankruptcy estate. Upon  
6 payment of the Purchase Amount, the Debtors shall be entitled to  
7 retain the Property and the Property shall cease being property  
8 of the bankruptcy estate.

9 9. Trustee believes that the sale of the non-exempt equity  
10 in the Property to the Debtors is in the best interests of the  
11 estate and should be approved by the Court. The proposed equity  
12 sale is an equitable and expeditious manner of liquidating the  
13 Property by which the bankruptcy estate will eliminate the risks,  
14 costs and delays of liquidating such assets.

15 WHEREFORE, Trustee respectfully requests that the Court  
16 approve the Agreement, and authorize the Trustee to enter into  
17 the proposed sale of the non-exempt equity in the Property to the  
18 Debtors.

19 Dated: 5-24-4

Law Office of Carl W. Collins

  
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21 Carl W. Collins  
22 Attorney for Trustee  
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